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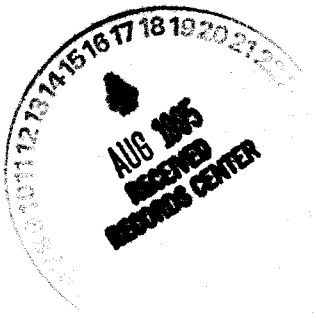


August 9, 1995

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SAMPLING ACTIVITIES ON THE OPERABLE UNIT ONE INTERIM MEASURE/ INTERIM REMEDIAL ACTION - JRC-007-95

The purpose of this correspondence is to clarify circumstances regarding sampling activities at the 881 Hillside. Several different types of sampling are currently performed under Work Package #12003 Testing and Operations - OU1 881 Hillside. The types of sampling include discharge sampling, influent characterization sampling, and process sampling. The first two sampling activities are the primary areas of interest referenced in this correspondence.

Sampling of the collection well, french drain sump, and 881 footing drain are currently performed on a monthly basis. The document that requires the sampling of these locations is the Interim Measure/Interim Remedial Action French Drain Performance Monitoring Plan (FDPMP). The required sampling frequency according to this document is quarterly. However, the collection well and french drain sump have been sampled monthly in order to facilitate data collection and closeout of the OU1 IM/IRA. The recent discontinuation of treatment and collection of the 881 footing drain (after a series of monthly samples) has resulted in a return to quarterly sampling at that location.

The Analysis Plan According to the FDPMP is as follows:

"The samples collected from the french drain monitoring wells and collection system will be analyzed for Contract Laboratory Program (CLP) Target Compound List (TCL) organics including volatiles, semi-volatile, and pesticide/PCBs. In addition, samples for analysis of CLP Target Analyte List (TAL) metals, radionuclides, and other inorganics will be collected during this monitoring program. Water samples will be analyzed in the field for pH, specific conductivity, and temperature. Surface water samples will be analyzed for the same parameters and will also be tested in the field for the dissolved oxygen content. The field and analytical parameters are presented in Table 2-4 of the Analysis Plan. All samples requiring filtration will be filtered in the field and all samples will be preserved in the field.

All analytical methods will follow the *General Radiochemistry and Routine Analytical Services Protocol* (GRRASP) (EG&G, 1990C). The CLP methods for CLP analytes are based on the EPA SW846 methods for analyzing wastewaters and solid wastes (EPA, 1986). Methods for anions and indicator parameters are based on EPA-developed or EPA-reviewed and approved methods sufficient to meet the data quality objectives. Radionuclide analytical methods have been either developed or reviewed and approved by EPA."

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Concerns have been raised recently in regards to the Contract Laboratory Program (CLP) detection limits for Volatile Organic Compounds that are reported on samples taken at the collection well and french drain sump. The old detection limits were generally five and ten micrograms per liter. New detection limits of 10 micrograms per liter have recently been implemented through the Sample Management Office (SM0). The difficulty with the revised detection limit is in comparing a detection limit of 10 ug/l to an ARAR (applicable or relevant and appropriate requirements) of 5 ug/l for several compounds. The general practice for the laboratory is to report anything that is detected below 10 ug/l and flag it with a "J" qualifier, indicating that it is an estimated value. In general, detections down to 1 ug/l will be reported in one form or another (either as estimated or detected). Therefore, quantitative information on the concentrations of Volatile Organic Compounds at these locations is available.

Two effluent tank samples were affected by the revised detection limits. Adequate detection limits were obtained by requesting the old detection limits from the laboratory in the first instance. A VOA 524.2 analysis was obtained for the second sample in order to obtain acceptable detection limits. Therefore, all discharges were made with legally defensible data.

Because more stringent ARARs will be applied to the Sitewide Treatment Facility, the data obtained needs to reflect these changes. Therefore, an initiative to use only VOA 524.2 was implemented in July 1995. However, data provided in the current quarterly report (April through June 1995 including Data Summary from January through March 1995) and in the next quarterly report (July through September 1995, including Data Summary from April through June 1995) will have the higher detection limits. Effluent discharge data detection limits will remain at or below the respective ARARs for all compounds. Future data will reflect the lower VOA 524.2 method detection limits (0.1ug/l to 0.2 ug/l).

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